

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

TZVI WEISS, et al.,

Plaintiffs,

- against -

NATIONAL WESTMINSTER BANK PLC,

Defendant.

Case No. 05-CV-4622 (DLI) (RML)

NATAN APPLEBAUM, et al.,

Plaintiffs,

- against -

NATIONAL WESTMINSTER BANK PLC,

Defendant.

Case No. 07-CV-916 (DLI) (RML)

Oral Argument Requested

**DECLARATION OF MARK E. MCDONALD IN SUPPORT OF THE MOTION FOR
SUMMARY JUDGMENT BY NATIONAL WESTMINSTER BANK PLC**

Mark E. McDonald declares as follows:

1. I am an attorney admitted to practice before this Court and an associate at Cleary Gottlieb Steen & Hamilton LLP, counsel to Defendant National Westminster Bank Plc (“NatWest”). I submit this declaration in support of NatWest’s motion for summary judgment.

2. Submitted with this declaration are true and correct copies of the following documents, which are cited in NatWest's Supplemental Statement of Additional Material Facts As To Which There Is No Genuine Issue Pursuant To Local Civil Rule 56.1.

EXHIBIT 1: NW013323-28

EXHIBIT 2: NW012954

- EXHIBIT 3: NW068905-06
- EXHIBIT 4: Excerpts from the June 25, 2008 deposition of Belinda Lane
- EXHIBIT 5: NW008321-22
- EXHIBIT 6: NW052911-3096
- EXHIBIT 7: NW052643-65
- EXHIBIT 8: Summary prepared pursuant to Federal Rule of Evidence 1006 of bank records previously produced by NatWest in these lawsuits of outgoing wire transfers to the 13 charities that plaintiffs contend are alter egos of or controlled by Hamas, processed by NatWest on behalf of its customer Interpal between November 8, 1996 and September 25, 2003 (“Transfer Chart”)
- EXHIBIT 9: NW066844-46
- EXHIBIT 10: Excerpts from the July 23, 2010 deposition of Amanda Holt
- EXHIBIT 11: NW0066672-76
- EXHIBIT 12: Excerpts from the July 16, 2010 deposition of Stephen Foster
- EXHIBIT 13: Excerpts from the July 22, 2010 deposition of Irvine Rodger
- EXHIBIT 14: Excerpts from the July 13, 2010 deposition of Neil Trantum
- EXHIBIT 15: Excerpts from the June 23, 2008 deposition of Ian Wickens

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
April 11, 2018



Mark E. McDonald